

Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Rita Sethi <rsethi@stollglickman.com>

Sun 1/7/2024 10:42 PM

To:Emanuel Kataev <Emanuel@mllaborlaw.com>;Andrew Stoll <astoll@stollglickman.com>

Cc:Joseph Labuda <joe@mllaborlaw.com>;David Aminov <daminov@mllaborlaw.com>

Hi Emanuel:

Sure, I am available to meet and confer to discuss and schedule all remaining depositions, including Danielle Silva's.

Plaintiff's Depositions

Frank Russo. Jr.: I am not sure how you didn't know we wanted to depose him since we made requests on December 4, January 2, January 3 and included the request in our status letter to Judge Pollak on December 4, 2023.

Jaclyn Ceparano: I am not sure how you didn't know we wanted to depose her since we noticed her deposition in August; discussed via email on September 20, October 5, October 27; discussed during our meet and confer and via email on November 8; via email on December 4, and included the request in our status letter to Judge Pollak on December 4, 2023.

Defendant's Depositions

Danielle Silva: you requested for the first time a deposition of Ms. Silve on this past Thursday, January 5

Kalief Williams: Plaintiff's deposition is scheduled for January 12, 2024. You notified us this past Wednesday that you would like to depose him in-person, which we will discuss when we meet and confer this week.

Let me know if either of these times work for a meet and confer: Tuesday 1/9 at 2 PM or Wednesday 1/10 at 12 PM. If these times don't work, please propose others.

Best,
Rita

Rita A. Sethi
(she/hers)
Stoll, Glickman & Bellina LLP
300 Cadman Plaza West, 12th Floor
Brooklyn, N.Y. 11201
Phone: 718-852-3710
Fax: 718-852-3586
<https://www.stollglickman.com>

From: Emanuel Kataev <Emanuel@mllaborlaw.com>

Sent: Saturday, January 6, 2024 12:52 AM

To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>

Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>

Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Dear Rita:

Please provide your availability to meet and confer concerning Danielle Silva on Monday, January 8, 2024.

Best,

Emanuel Kataev, Esq.
Partner
Milman Labuda Law Group PLLC
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

This message and its attachments may contain confidential information that is legally privileged. If you are not the intended recipient, you are hereby notified that any printing, copying, forwarding, or saving of this message is strictly prohibited. If you have received this email in error, please notify the sender immediately and delete the message and any attachment from your system.

From: Emanuel Kataev
Sent: Thursday, January 4, 2024 4:57 PM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <castoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: RE: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi, Rita:

When we confirmed deposition dates, we assumed that you only wanted to depose Defendants Robert Russo and Giuseppe Vacca. Unfortunately, we are not available on January 11 nor January 12 to depose Frank Russo, who is no longer a party in this case.

Separately, we write to confirm that Plaintiff Kalief William's deposition will proceed in person on Friday, January 12, 2024 at our office.

Finally, you produced an unnotarized affidavit from Danielle Silva in your Thursday, December 28, 2023 document production and referenced that affidavit during today's deposition of Defendant Robert Russo. We would like to depose her. Please advise as to whether you will voluntary produce Danielle Silva and, if not, kindly provide her last known address and any other contact information in Plaintiff's position.

Thanks and best,

Emanuel Kataev, Esq.
Partner
Milman Labuda Law Group PLLC
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

This message and its attachments may contain confidential information that is legally privileged. If you are not the intended recipient, you are hereby notified that any printing, copying, forwarding, or saving of this message is strictly prohibited. If you have received this email in error, please notify the sender immediately and delete the message and any attachment from your system.

From: Rita Sethi <rsethi@stollglickman.com>
Sent: Wednesday, January 03, 2024 4:29 PM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi Emanuel:

Below is the link for Robbie's deposition tomorrow at 10 AM to share with your client as well.

Again, please advise if Frank Russo is available on January 10 or January 11 for his deposition and send the link for Kalief's deposition on January 12.

Thanks,
Rita

Topic: Williams vs The Russo's Payroll Group et al
Time: Eastern Time (US and Canada)

Join Zoom Meeting

[https://beereporting.zoom.us/j/81373886830?pwd=WaLd601qjaQQxkDKvaUUxgvbaZ1atBF.1](https://beereporting.zoom.us/j/81373886830?pwd=WaLd601qjaQxkDKvaUUxgvbaZ1atBF.1)

Meeting ID: 813 7388 6830
Passcode: 286554

Rita A. Sethi
(she/hers)
Stoll, Glickman & Bellina LLP
300 Cadman Plaza West, 12th Floor
Brooklyn, N.Y. 11201
Phone: 718-852-3710
Fax: 718-852-3586
<https://www.stollglickman.com>

From: Rita Sethi <rsethi@stollglickman.com>
Sent: Tuesday, January 2, 2024 4:58 PM
To: Emanuel Kataev <Emanuel@mllaborlaw.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Hi Emanuel:

It is my understanding that all depositions are proceeding virtually. I will send you the links for Robbie Russo and Giuseppe Vacca when I receive them.

Please advise if Frank Russo is available on January 10 or January 11 for his deposition and send the link for Kalief's deposition on January 12.

Best,
Rita

Rita A. Sethi
(she/hers)
Stoll, Glickman & Bellina LLP
300 Cadman Plaza West, 12th Floor
Brooklyn, N.Y. 11201
Phone: 718-852-3710
Fax: 718-852-3586
<https://www.stollglickman.com>

From: Emanuel Kataev <Emanuel@mllaborlaw.com>
Sent: Monday, January 1, 2024 6:14 PM
To: Rita Sethi <rsethi@stollglickman.com>; Andrew Stoll <astoll@stollglickman.com>
Cc: Joseph Labuda <joe@mllaborlaw.com>; David Aminov <daminov@mllaborlaw.com>
Subject: Re: Williams v. The Russo's Payroll Group, Inc., et al.; Case No.: 1:21-cv-2922 (EK) (CLP) (EDNY)

Dear Rita and Andrew:

Happy new year. I write to ascertain the format of depositions. I have not received any notice of deposition for Robert Russo, and a prior notice sent for another witness designated the deposition to proceed virtually. Kindly confirm.

Thanks and best,

Emanuel Kataev, Esq.
Partner
Milman Labuda Law Group PLLC
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

This message and its attachments may contain confidential information that is legally privileged. If you are not the intended recipient, you are hereby notified that any printing, copying, forwarding, or saving of this message is strictly prohibited. If you have received this email in error, please notify the sender immediately and delete the message and any attachment from your system.